WAIVER REQUEST

Automated Mass Replacement of SNAP Benefits

1. Type of Request: Initial

2. **Primary Regulation Citation:** 7 CFR 274.6(a)

3. Secondary Regulation Citation: 7 CFR 274.6(a)(6)(ii)

4. State: California

5. FNS Region: Western

- 6. **Regulatory Requirement:** Current regulations at 7 CFR 274.6(a)(3) and (a)(4) allow for food that was purchased with SNAP benefits that was destroyed in a household misfortune or disaster to be replaced, if the household reports the loss within 10 days. Per 7 CFR 274.6(a)(6)(ii), the household must also provide verification of the loss.
- 7. Proposed Alternative Procedures: The State of California proposes to provide automated mass replacement of 60%, which is the estimated percentage of benefits spent on perishable food items, of July 2018 benefits without requiring households to report or verify the loss of food purchased with SNAP benefits in areas in which more than 50% of the residents lost power for four hours or more due to multiple wildfires burning between three counties. California proposes to automatically replace 60% of July 2018 SNAP benefits to households in the counties of Shasta, Mendocino, and Lake with the following ZIP codes:
 - Shasta County: 96001, 96003, 96033, 96087, 96019, 96047
 - Mendocino County: 95410, 95418, 95420, 95427, 95432, 95463, 95437, 95460, 95415, 95466, 95456, 95470, 95469, 95494, 95490, 95482, 95488, 95459, 95481
 - Lake County: 95458, 95493, 95464, 95485
- 8. **Justification for Request:** This waiver is requested under provisions at CFR 272.3(c)(1)(ii), which allow for the approval of waivers that result in a more effective and efficient administration of SNAP. Since we can verify power loss for large areas through our disaster response assessment process, we do not have the need to verify loss of food for individual cases. Moreover, since so many residents have lost power and have been evacuated, we can replace these benefits much timelier and efficiently via an automated process without requiring the affected households to report a loss of food.

Please take note, when determining whether certain impacted, *rural* ZIP codes met the criteria necessary to apply for mass replacements, it was, at times, difficult to find household data which could be paired with the utility data to make the qualifying determination, as the documentation and utility reports will indicate. The main reason for this is outdated 2010 Census data. However, in those rural ZIP codes, there is utility data provided that shows outages of four hours or more that impacted *at least* 50% of the residents serviced by a specific utility provider.

9. Anticipated Impact on Households: This waiver will ensure current SNAP households in Shasta, Mendocino, and Lake County receive timely replacement of perishable food that was lost due to the extensive power outages caused by the Southern California wildfires and will allow these counties to more effectively use staff to concentrate on timely processing of individual replacement requests for SNAP households not included in our mass replacement process and the influx of new applications that may result from this emergency.

10. Affected Caseload:

County	Total Households	Total Individuals	Total July Issuance	Requested Replacement Amount (Total July Issuance x 60%)
Shasta	6,107	10,501	\$1,359,423	\$815,654
Mendocino	5,453	9,832	\$1,313,194	\$787,916
Lake	913	1,521	\$193,085	\$115,851

- 11. Anticipated Implementation Date: The waiver is requested for immediate implementation. California requests that Shasta, Mendocino, and Lake County be allowed to use this automated process to replace benefits on or about August 16, 2018, or as soon administratively possible.
- 12. **Proposed Quality Control Procedures**: The proposal does not affect quality control sampling or procedures.
- 13. Signature and Title of Requesting Official:

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14. Date of Request: August 6, 2018